

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THRIVENT FINANCIAL FOR
LUTHERANS,

Plaintiff,

v.

JAMES E. HARRIS; JAMES E. HARRIS, JR.;
ANDREA HARRIS; J.H. (A MINOR),

Defendants.

3:16-cv-03368-MGL

**LOCAL CIVIL RULE 26.01 DISCLOSURE
STATEMENT**

Plaintiff Thrivent Financial for Lutherans (“**Thrivent**”), through its undersigned counsel, responds to the interrogatories set forth in Local Rule 26.01 as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Thrivent is not aware of any persons or legal entities who may have a subrogation interest in any of Thrivent’s claims asserted herein.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Thrivent’s claims should be tried non-jury, because Thrivent seeks a declaratory judgment as to the legal effect of a change of beneficiary form under South Carolina law.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a

parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Thrivent is not a publicly-owned company. Thrivent has no parent corporations and no publicly-held corporation owns 10% or more of Thrivent's stock. Thrivent is not the parent of any publicly-owned company and Thrivent does not own 10% or more of the shares of any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: Thrivent asserted its claims in the Columbia Division under Local Rule 3.01(a)(1), because the defendants are natural persons who, upon information and belief, reside within this Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption of the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending.

RESPONSE: This action does not relate, in whole or in part, to any other matter filed in this District.

[SIGNATURE BLOCK ON NEXT PAGE]

This the 12th day of October, 2016.

Greenville, South Carolina.

/s/ Catherine Wrenn

Catherine F. Wrenn (Fed. Id No. 10230)
Womble Carlyle Sandridge & Rice, LLP
550 S. Main Street, Suite 400
Greenville, South Carolina 29601
Telephone: (864) 255-5424
Fax: (864) 239-5864
Email: cwrenn@wcsr.com

*Attorneys for Plaintiff Thrivent Financial for
Lutherans, Inc.*

James A. Dean
NC Bar No. 39623
One W. 4th Street
Winston-Salem, NC 27101
Phone: 336-721-3600
Fax: 336-721-3660
Email: jdean@wcsr.com

Of Counsel